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Project No. CF167-1906

Ms. Madi Novak
Remedial Project Manager, Superfund and Emergency Management Division
U.S. Environmental Protection Agency, Oregon Operations Office
805 SW Broadway, Suite 500
Portland, OR 97205-3331

**Subject: Q1 January 1–March 31, 2021 Quarterly Progress Report, Arkema Project Area
Administrative Settlement Agreement and Order on Consent for Remedial
Design at the River Mile 7 West Project Area
U.S. EPA Region 10 CERCLA Docket No. 10-2020-0054**

Dear Ms. Novak:

On behalf of Legacy Site Services LLC (LSS), agent for Arkema Inc. (Arkema), this letter presents the quarterly progress report for work performed on the Arkema Project Area. This progress report is being submitted in accordance with Section 4.1 of Appendix A1, Arkema Statement of Work for the Administrative Settlement Agreement and Order on Consent for Remedial Design at the River Mile 7 West Project Area (CERCLA Docket No. 10-2020-0054) entered into by Arkema and the U.S. Environmental Protection Agency (EPA) with an effective date of February 21, 2020.

a) Actions that have been taken toward achieving compliance with the Settlement:

- On January 28, 2021, received EPA's conditional approval and comments on the December 18, 2020 Revised Pre-design Investigation (PDI) Work Plan.
- On February 9, 2021, participated in a meeting with EPA to discuss key comments on the December 2020 PDI Work Plan.
- Received an email message from EPA on February 9, 2021, clarifying that the EPA's General Comment #5 on the December 2020 Revised PDI Work Plan regarding HxCDF was not intended as a directive and EPA is open to continued exchange of information on the topic.

- On February 10, 2021, submitted proposed dioxin and furan sampling locations for groundwater and porewater to EPA. The proposed sampling locations were approved by EPA in an email message on February 12, 2021.
 - On February 17, 2021, participated in a meeting with EPA to discuss the general field schedule and related issues.
 - Submitted a revised PDI Work Plan to EPA on March 10, 2021.
 - Initiated site-wide groundwater monitoring in support of the Phase 1 PDI on March 15, 2021.
 - On March 17, 2021, submitted a field change request form (FCR-01) for collecting total and dissolved samples for groundwater that has elevated turbidity.
 - Participated in a meeting with EPA on March 22, 2021, to discuss FCR-01, comments on the March 2021 Revised PDI work plan, and details on the Phase 1 PDI fieldwork.
 - Received comments from EPA on the March 2021 Revised PDI work plan in a March 23, 2021 email message.
 - Received approval by EPA for field change request form FCR-01 in a March 25, 2021 email message.
- b) List of all results of validated sampling, tests, and all other data received or generated by Respondent Arkema to comply with the Settlement:
- None.
- c) List of all deliverables that Respondent Arkema submitted to EPA:
- Draft PDI Work Plan (dated June 18, 2020).
 - Revised PDI Work Plan (dated December 18, 2020).
 - Revised PDI Work Plan (dated March 10, 2021)
- d) List of all activities scheduled for the next quarter:
- Complete the site-wide groundwater monitoring event.
 - Receive data and initiate data validation for the site-wide groundwater monitoring event.
 - Continue planning of the Phase 1 sediment and riverbank soil PDI field sampling in accordance with the PDI Work Plan. Secure access agreements for

sampling on property owned by the Oregon Department of State Lands, BNSF Railway Company, GS Roofing, and Kinder Morgan.

- e) Information regarding percentage of completion, unresolved delays encountered or anticipated that may affect the future schedule for implementation of the Arkema RD Work, and a description of efforts made to mitigate those delays or anticipated delays:
 - None.
- f) List of any modifications to the work plans or other schedules that Respondent Arkema has proposed or that have been approved by EPA:
 - LSS submitted a field change request form (FCR-01) on March 17, 2021, for collecting total and dissolved samples for groundwater that has elevated turbidity. The field change request form was approved by EPA in an email message on March 25, 2021.
- g) List of all activities undertaken in support of the CIP during the reporting period and those to be undertaken in the next quarter:
 - EPA did not request any community involvement plan support for the Arkema Project Area during this reporting period.

Please contact me at (503) 943-3614 or Mike Pinto at (484) 437-1991 if you have any questions or comments pertaining to this progress report.

Sincerely,



Eron Dodak, R.G.
Senior Consultant